

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON/GREENWOOD DIVISION

Beverly Thomas,	)	C.A. No.: 8:09-1714-HFF
	)	
Plaintiff,	)	
	)	
vs.	)	<b>ANSWERS TO LOCAL RULE</b>
	)	<b>26.01 INTERROGATORIES</b>
BASF Corporation,	)	
	)	
Defendant.	)	

(a) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest;

None.

(b) As to each claim, state whether it should be tried jury or nonjury and why;

This matter should be tried nonjury because it is a claim governed by ERISA.

(c) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares;

No. Plaintiff is a private individual.

(d) State the basis for asserting the claim in the division in which it was filed (or

the basis of any challenge to the appropriateness of the division);

Plaintiff believes that the Defendant provides life insurance coverage to a number of individuals in the Division in which this action was filed and that this is the appropriate District and Division for this matter.

(e) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

No. This case is not related to any other case pending in this District or Division.

s/ Robert E. Hoskins  
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Date: June 26, 2009

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